

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

—X

BROOKE TAYLOR, CIELO JEAN GIBSON,
JESSICA BURCIAGA, DESSIE MITCHESON,
SARA UNDERWOOD, CORA SKINNER,
RACHEL KOREN, TIFFANY TOTH, LINA
POSADA, DANIELLE RUIZ, CLARK GILMER,
CAMILA DAVALOS, MARIANA DAVALOS, JAIME
EDMONDSON, LAURIE FETTER JACOBS,
NATALIA VELEZ, JESSA HINTON, ERIKA
SCHWEGLER, URSULA MAYES, KIM COZZENS,
JENNIFER WALCOTT ARCHULETA, PAOLA CANAS,
ROSIE JONES, MELANIE IGLESIAS, and
ARIANNY CELESTE,

Case No.: 16-cv-567

**ANSWER TO
AMENDED COMPLAINT**

Plaintiffs,

-against-

44TH ENTERPRISES CORP., d/b/a DIAMOND
CLUB GENTLEMAN'S CABARET, MLB
ENTERPRISE CORP., d/b/a LACE GENTLEMEN'S
CLUB, ANTHONY CAPECI, LACE ENTERTAINMENT,
INC, d/b/a LACE GENTLEMAN'S CLUB, GLEN
ORECCHIO, STILETTO ENTERTAINMENT, LLC,
d/b/a STILETTO'S, ATLANTIC ENTERTAINMENT, INC.,
GJJM ENTERPRISES, LLC and MICHAEL ORECCHIO,

Defendants.

—X

44TH ENTERPRISES CORP., d/b/a DIAMOND
CLUB GENTLEMAN'S CABARET, MLB
ENTERPRISE CORP., d/b/a LACE GENTLEMEN'S
CLUB, and ANTHONY CAPECI,

Third-Party
Plaintiffs,

-against-

WEB GUY PRODUCTIONS, LLC and
JAMES KAMOWITZ

Third-Party
Defendants.

X
Defendant, ATLANTIC ENTERTAINMENT, INC., by its attorneys, FAUST GOETZ
SCHENKER & BLEE, as and for its answer to the Plaintiffs' Amended Complaint, respectfully
allege:

BACKGROUND

1. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 1, and leaves all matters of law to the Honorable Court.
2. Denies each and every allegation set forth in the paragraph numbered 2, and leaves all matters of law to the Honorable Court.
3. Denies each and every allegation set forth in the paragraph numbered 3, and leaves all matters of law to the Honorable Court.
4. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 4, and leaves all matters of law to the Honorable Court.

JURISDICTION & VENUE

5. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 5, and leaves all matters of law to the Honorable Court.
6. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 6, and leaves all matters of law to the Honorable Court.
7. Denies each and every allegation set forth in the paragraph numbered 7, except admits that Defendant, ATLANTIC ENTERTAINMENT, INC., conducts business in the state of New Jersey, and leaves all matters of law to the Honorable Court.
8. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 8, and leaves all matters of law to the Honorable Court.

9. Denies each and every allegation set forth in the paragraph numbered 9, and leaves all matters of law to the Honorable Court.

PARTIES

Plaintiffs

10. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 10, and leaves all matters of law to the Honorable Court.

11. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 11, and leaves all matters of law to the Honorable Court.

12. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 12, and leaves all matters of law to the Honorable Court.

13. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 13, and leaves all matters of law to the Honorable Court.

14. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 14, and leaves all matters of law to the Honorable Court.

15. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 15, and leaves all matters of law to the Honorable Court.

16. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 16, and leaves all matters of law to the Honorable Court.

17. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 17, and leaves all matters of law to the Honorable Court.

18. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 18, and leaves all matters of law to the Honorable Court.

19. Denies knowledge and information sufficient to form a belief as to those allegations

set forth in paragraph numbered 19, and leaves all matters of law to the Honorable Court.

20. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 20, and leaves all matters of law to the Honorable Court.

21. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 21, and leaves all matters of law to the Honorable Court.

22. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 22, and leaves all matters of law to the Honorable Court.

23. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 23, and leaves all matters of law to the Honorable Court.

24. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 24, and leaves all matters of law to the Honorable Court.

25. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 25, and leaves all matters of law to the Honorable Court.

26. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 26, and leaves all matters of law to the Honorable Court.

27. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 27, and leaves all matters of law to the Honorable Court.

28. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 28, and leaves all matters of law to the Honorable Court.

29. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 29, and leaves all matters of law to the Honorable Court.

30. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 30, and leaves all matters of law to the Honorable Court.

31. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 31, and leaves all matters of law to the Honorable Court.

32. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 32, and leaves all matters of law to the Honorable Court.

Defendants

33. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 33, and leaves all matters of law to the Honorable Court.

34. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 34, and leaves all matters of law to the Honorable Court.

35. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 35, and leaves all matters of law to the Honorable Court.

36. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 36, and leaves all matters of law to the Honorable Court.

37. Denies each and every allegation set forth in the paragraph numbered 37, except admits that Defendant, GLEN ORECCHIO, resides in the state of New York, and leaves all matters of law to the Honorable Court.

38. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 38, and leaves all matters of law to the Honorable Court.

39. Denies each and every allegation set forth in the paragraph numbered 39, except admits that Defendant, ATLANTIC ENTERTAINMENT, INC., conducts business in the state of New York, and leaves all matters of law to the Honorable Court.

40. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 40, and leaves all matters of law to the Honorable Court.

41. Denies each and every allegation set forth in the paragraph numbered 41, and leaves all matters of law to the Honorable Court.

42. Denies each and every allegation set forth in the paragraph numbered 42, and leaves all matters of law to the Honorable Court.

FACTUAL ALLEGATIONS

43. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 43, and leaves all matters of law to the Honorable Court.

44. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 44, and leaves all matters of law to the Honorable Court.

45. Denies each and every allegation set forth in the paragraph numbered 45, and leaves all matters of law to the Honorable Court.

46. Upon information and belief denies those allegations set forth in paragraph numbered 46, and leaves all matters of law to the Honorable Court.

47. Denies each and every allegation set forth in the paragraph numbered 47, and leaves all matters of law to the Honorable Court.

Plaintiffs' Backgrounds and Careers

48. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 48.

49. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 49, and leaves all matters of law to the Honorable Court..

50. Upon information and belief denies those allegations set forth in paragraph numbered 50, and leaves all matters of law to the Honorable Court.

51. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 51.

52. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 52, and leaves all matters of law to the Honorable Court.

53. Upon information and belief denies those allegations set forth in paragraph numbered 53, and leaves all matters of law to the Honorable Court.

54. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 54.

55. Denies each and every allegation set forth in the paragraph numbered 55, and leaves all matters of law to the Honorable Court.

56. Upon information and belief denies those allegations set forth in paragraph numbered 56, and leaves all matters of law to the Honorable Court.

57. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 57.

58 Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 58, and leaves all matters of law to the Honorable Court..

59. Upon information and belief denies those allegations set forth in paragraph numbered 59, and leaves all matters of law to the Honorable Court.

60. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 60.

61. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 61, and leaves all matters of law to the Honorable Court.

62. Upon information and belief denies those allegations set forth in paragraph numbered 62, and leaves all matters of law to the Honorable Court.

63. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 63.

64. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 64, and leaves all matters of law to the Honorable Court..

65. Upon information and belief denies those allegations set forth in paragraph numbered 65, and leaves all matters of law to the Honorable Court.

66. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 66.

67. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 67, and leaves all matters of law to the Honorable Court.

68. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 68, and leaves all matters of law to the Honorable Court.

69. Upon information and belief denies those allegations set forth in paragraph numbered 69, and leaves all matters of law to the Honorable Court.

70. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 70.

71. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 71, and leaves all matters of law to the Honorable Court.

72. Upon information and belief denies those allegations set forth in paragraph numbered 72, and leaves all matters of law to the Honorable Court.

73. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 73.

74. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 74, and leaves all matters of law to the Honorable Court.

75. Upon information and belief denies those allegations set forth in paragraph numbered 75, and leaves all matters of law to the Honorable Court.

76. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 76.

77. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 77, and leaves all matters of law to the Honorable Court.

78. Upon information and belief denies those allegations set forth in paragraph numbered 78, and leaves all matters of law to the Honorable Court.

79. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 79.

80. Denies each and every allegation set forth in the paragraph numbered 80, and leaves all matters of law to the Honorable Court.

81. Upon information and belief denies those allegations set forth in paragraph numbered 81, and leaves all matters of law to the Honorable Court.

82. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 82.

83. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 83.

84. Denies each and every allegation set forth in the paragraph numbered 84, and leaves all matters of law to the Honorable Court.

85. Upon information and belief denies those allegations set forth in paragraph numbered 85, and leaves all matters of law to the Honorable Court.

86. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 86.

87. Denies each and every allegation set forth in the paragraph numbered 87 as to this answering defendant and denies knowledge and information sufficient to form a belief as to the remaining allegations, and leaves all matters of law to the Honorable Court.

88. Upon information and belief denies those allegations set forth in paragraph numbered 88, and leaves all matters of law to the Honorable Court.

89. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 89.

90. Denies each and every allegation set forth in the paragraph numbered 90, and leaves all matters of law to the Honorable Court.

91. Upon information and belief denies those allegations set forth in paragraph numbered 91, and leaves all matters of law to the Honorable Court.

92. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 92.

93. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 93, and leaves all matters of law to the Honorable Court.

94. Upon information and belief denies those allegations set forth in paragraph numbered 94, and leaves all matters of law to the Honorable Court.

95. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 95.

96. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 96, and leaves all matters of law to the Honorable Court.

97. Upon information and belief denies those allegations set forth in paragraph numbered 97, and leaves all matters of law to the Honorable Court.

98. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 98.

99. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 99, and leaves all matters of law to the Honorable Court.

100. Upon information and belief denies those allegations set forth in paragraph numbered 100, and leaves all matters of law to the Honorable Court.

101. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 101.

102. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 102, and leaves all matters of law to the Honorable Court.

103. Upon information and belief denies those allegations set forth in paragraph numbered 103, and leaves all matters of law to the Honorable Court.

104. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 104.

105. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 105, and leaves all matters of law to the Honorable Court.

106. Upon information and belief denies those allegations set forth in paragraph numbered 106, and leaves all matters of law to the Honorable Court.

107. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 107.

108. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 108, and leaves all matters of law to the Honorable Court.

109. Upon information and belief denies those allegations set forth in paragraph numbered 109, and leaves all matters of law to the Honorable Court.

110. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 110.

111. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 111, and leaves all matters of law to the Honorable Court..

112. Upon information and belief denies those allegations set forth in paragraph numbered 112, and leaves all matters of law to the Honorable Court.

113. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 113.

114. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 114, and leaves all matters of law to the Honorable Court..

115. Upon information and belief denies those allegations set forth in paragraph numbered 115, and leaves all matters of law to the Honorable Court.

116. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 116.

117. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 117, and leaves all matters of law to the Honorable Court..

118. Upon information and belief denies those allegations set forth in paragraph numbered 118, and leaves all matters of law to the Honorable Court.

Defendants' Business

44th Enterprise

119. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 119, and leaves all matters of law to the Honorable Court.

120. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 120, and leaves all matters of law to the Honorable Court.

121. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 121, and leaves all matters of law to the Honorable Court.

122. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 122, and leaves all matters of law to the Honorable Court.

123. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 123, and leaves all matters of law to the Honorable Court.

124. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 124, and leaves all matters of law to the Honorable Court.

125. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 125, and leaves all matters of law to the Honorable Court.

126. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 126, and leaves all matters of law to the Honorable Court.

127. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 127, and leaves all matters of law to the Honorable Court.

MLB

128. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 128, and leaves all matters of law to the Honorable Court .

129. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 129, and leaves all matters of law to the Honorable Court.

130. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 130, and leaves all matters of law to the Honorable Court.

131. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 131, and leaves all matters of law to the Honorable Court.

132. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 132, and leaves all matters of law to the Honorable Court.

133. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 133, and leaves all matters of law to the Honorable Court.

134. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 134, and leaves all matters of law to the Honorable Court.

135. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 135, and leaves all matters of law to the Honorable Court.

136. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 136, and leaves all matters of law to the Honorable Court.

Lace Entertainment

137. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 137, and leaves all matters of law to the Honorable Court.

138. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 138, and leaves all matters of law to the Honorable Court.

139. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 139, and leaves all matters of law to the Honorable Court.

140. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 140, and leaves all matters of law to the Honorable Court.

141. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 141, and leaves all matters of law to the Honorable Court.

142. Denies knowledge and information sufficient to form a belief as to those allegations set forth in paragraph numbered 142, and leaves all matters of law to the Honorable Court.